

**Comments on DA-10-1348A,
“In the Matter of International Comparison Requirements Pursuant to the Broadband
Data Improvement Act International Broadband Data Report, GN Docket No. 09-47”**

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Introduction.

My name is David Mark Kennet. I hold a Ph.D. in economics from the University of Wisconsin – Madison, and I have done extensive consulting work around the world in the area of telecommunications policy in general, and, to a lesser extent, broadband issues specifically. I have worked for the regulatory authorities in Peru, Jordan, and Ecuador on designing policies and tariffs to foster broadband infrastructure growth, and I have helped a number of private operators develop regulatory strategies aimed at stimulating private investment in this area.

Comments.

I believe that the FCC is to be commended for this ambitious data collection effort. Recognizing the amount of work that has been required to develop the proposal currently in play, I think there remain a small number of possible improvements that could make future efforts even more useful. I will organize these comments according to the two relevant sections of the original document.

A. Broadband Service Capability.

In addition to the measures proposed, if possible I would suggest the inclusion of the following measures.

- Measures of service quality. Examples might be jitter or latency.
- Point-to-point transmission speed. Most of the declared speeds are merely the speeds between the network switch or router and the end user, and do not take into account congestion on the provider's backbone.

I believe that information on the above variables can be collected voluntarily from users in each country by simply asking them to report results of a simple internet measurement software tool.

In addition, it would be useful to collect any available information on the degree of centralized control of internet traffic and content.

Finally, in collecting pricing data it would be helpful to not only reflect a price associated with speed but also any two-part tariff arrangements (e.g., monthly fixed charge together with a charge per Mb downloaded). Also, prices might be usefully broken down between postpaid and prepaid plans.

B. Community.

In addition to the measures proposed on income and education, I would recommend a measure of income distribution like the Gini coefficient. Since the ability to afford access depends on an individual's, rather than the average, ability to pay it is possible that disparities between countries of similar income levels may be explained by differing income distributions.

C. Other information.

One area that is not touched upon in this data collection effort but that may be important is the type of peering arrangement providers have with each other within a country, and any tariffs associated with that peering.

And finally, another useful variable that, if available, would be highly desirable is the percentage of users associated with each observation in the dataset.

Conclusion.

I express my thanks to the FCC for permitting me to give my views on this highly worthwhile effort.